

1 ROB BONTA
2 Attorney General of California
3 MARK R. BECKINGTON
4 Supervising Deputy Attorney General
5 ROBERT L. MEYERHOFF
6 Deputy Attorney General
7 State Bar No. 298196
8 300 South Spring Street, Suite 1702
9 Los Angeles, CA 90013-1230
10 Telephone: (213) 269-6177
11 Fax: (916) 731-2144
12 E-mail: Robert.Meyerhoff@doj.ca.gov
13 *Attorneys for Rob Bonta, in his official capacity as
14 Attorney General of the State of California*

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

**LANCE BOLAND, AN INDIVIDUAL;
MARIO SANTELLAN, AN
INDIVIDUAL; RENO MAY, AN
INDIVIDUAL, JEROME
SCHAMMEL, AN INDIVIDUAL; AND
CALIFORNIA RIFLE & PISTOL
ASSOCIATION,
INCORPORATED, A CALIFORNIA
CORPORATION;**

Case No. 8:22-cv-01421-CJC-ADS

**STIPULATION TO EXTEND TIME
RE: PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Plaintiffs,

V.

**ROBERT BONTA, IN HIS OFFICIAL
CAPACITY AS ATTORNEY GENERAL
OF CALIFORNIA.**

Defendant.

1 Plaintiffs Lance Boland, Mario Santellan, Reno May, Jerome Schammel, and
2 California Rifle & Pistol Association, Inc. (Plaintiffs) and Defendant Rob Bonta in
3 his official capacity as Attorney General of California (Defendant, and together
4 with Plaintiff, the Parties) hereby stipulate and agree as follows:

5 **WHEREAS**, on August 1, 2022, Plaintiffs filed their Original Complaint
6 (Dkt. 1) in this matter;

7 **WHEREAS**, on September 23, 2022, Plaintiffs filed their First Amended
8 Complaint (the FAC) (Dkt. 17);

9 **WHEREAS**, on October 7, 2022, Defendant filed his answer to the FAC;

10 **WHEREAS**, on November 15, 2022, Plaintiffs filed a Motion for Preliminary
11 Injunction (the Motion) (Dkt. 23), setting hearing on the Motion for December 19,
12 2022;

13 **WHEREAS**, under the current schedule, the deadline for Defendant to file a
14 response to the Motion is November 28, 2022, and thus Defendant's counsel would
15 be required to prepare the response on a short time frame and over the
16 Thanksgiving holiday;

17 **WHEREAS**, Defendant requested that Plaintiffs agree to continue the
18 deadline to respond to Plaintiffs' motion to December 5, 2022, to continue the
19 deadline for Plaintiffs to file their reply in support of their Motion to December 12,
20 2022, and to (in the Court's discretion) either hear the Motion on December 19,
21 2022 or continue the hearing on the Motion to January 9, 2023;

22 **WHEREAS**, Plaintiff agreed to continue the deadline on Defendant's
23 response to the Motion and Plaintiffs' reply in support of the motion but not the
24 hearing date on the Motion;

25 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the
26 Parties that, with the Court's permission, the deadline for Defendant's response to
27 the Motion is hereby continued to December 5, 2022, the deadline for Plaintiffs'

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1 reply in support of the Motion is hereby continued to December 19, 2022, and the
2 hearing on the Motion remains December 19, 2022, or, over Plaintiffs' objection, is
3 hereby continued to January 9, 2022.

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5 Dated: November 17, 2022

Respectfully submitted,

6 ROB BONTA
7 Attorney General of California
8 MARK R. BECKINGTON
9 Supervising Deputy Attorney General

10 /s/ Robert L. Meyerhoff
11 ROBERT L. MEYERHOFF
12 Deputy Attorney General

13 *Attorneys for Rob Bonta in his official
14 capacity as Attorney General for the
15 State of California*

16 Dated: November 17, 2022

Respectfully submitted,

17 /s/ Joshua Robert Dale
18 C.D. MICHEL
19 JOSHUA ROBERT DALE
20 ALEXANDER A. FRANK
21 KONSTADINOS T. MOROS

22 Michel & Associates, P.C.

23 *Attorneys for Plaintiffs Lance Boland,
24 Mario Santellan, Reno May, Jerome
25 Schammel, and the California Rifle &
26 Pistol Association, Incorporated*

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